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17 **IN THE UNITED STATES DISTRICT COURT
18 FOR THE DISTRICT OF NEVADA**

19 Cung Le, Nathan Quarry, Jon Fitch,
20 Brandon Vera, Luis Javier Vazquez, and
21 Kyle Kingsbury, on behalf of themselves and
22 all others similarly situated,

23 Plaintiffs,

24 v.

Zuffa, LLC, d/b/a Ultimate Fighting
25 Championship and UFC,

Defendant.

No.: 2:15-cv-01045-RFB-BNW

**JOINT MOTION TO EXTEND THE
BRIEFING DEADLINES FOR
PLAINTIFFS' MOTION RE
INJUNCTIVE RELIEF**

(First Request)

Pursuant to Local Rules IA 6-1 and 26-3, Plaintiffs Cung Le, Nathan Quarry, Jon Fitch, Brandon Vera, Luis Javier Vazquez, and Kyle Kingsbury (“Plaintiffs”), and Defendant Zuffa, LLC (“Zuffa”) (collectively, the “Parties”), by and through their undersigned attorneys, move to extend the briefing deadlines concerning Plaintiffs’ Motion re Injunctive Relief. This is the first motion for an extension of time for these briefing deadlines relating to Plaintiffs’ Motion re Injunctive Relief.

The Parties have met and conferred, reached an agreement, and now jointly move to extend the deadlines concerning Plaintiffs’ Motion re Injunctive Relief as follows:

Event	Current Deadline	Proposed New Deadline
Plaintiffs’ Motion re Injunctive Relief	December 1, 2023	December 22, 2023
Zuffa’s Opposition re Plaintiffs’ Motion re Injunctive Relief	December 31, 2023	January 22, 2024
Plaintiffs’ Reply re Plaintiff’s Motion re Injunctive Relief	January 30, 2024	February 21, 2024

As required by Local Rule 26-3, the Parties have good cause to extend these deadlines. In *Johnson v. Zuffa, LLC*, 2:21-cv-1189 (D. Nev.), the Parties set out the briefing schedule for Plaintiffs’ Motion re Injunctive Relief keyed off of the date the Ninth Circuit denies Zuffa’s Fed. R. Civ. P. 23(f) petition in *Le*. See *Johnson*, ECF No. 82 at 12 (Sept. 22, 2023).¹ Specifically, Plaintiffs Motion is due thirty (30) days after the resolution of Zuffa’s 23(f) petition. The Ninth Circuit denied Zuffa’s petition on November 1, 2023.

In light of the schedule for briefing Zuffa’s Motion for Summary Judgment, pursuant to which Plaintiffs’ Opposition is due November 30, 2023 (ECF No. 894), and the schedule for briefing Zuffa’s discovery motions, pursuant to which Plaintiffs’ Opposition is due November 13 (ECF No. 900), Plaintiffs require more time to brief these issues relating to injunctive relief. Moreover, under the existing schedule, Zuffa’s opposition to Plaintiffs’ Motion re Injunctive

¹ Although this briefing schedule was set out in a filing in the *Johnson* litigation, it applies in *Le*. See *Johnson*, ECF No. 82 at 11-12

1 Relief is due on December 31, *i.e.*, during the end-of-year holiday season. The three-week
 2 extension will provide sufficient time for Plaintiffs to prepare their papers for all of these
 3 motions, and for Zuffa to respond.

4 The requested extension of the briefing timeline will not affect any other deadlines in this
 5 matter.

6
 7 DATED: November 7, 2023

8 By: /s/ William A. Isaacson
 9 William A. Isaacson

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Respectfully Submitted,

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17 *Counsel for the Class and Attorneys for
18 Individual and Representative Plaintiffs.*

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on this 7th day of November, 2023 a true and correct copy of the Parties'

3 **JOINT MOTION TO EXTEND THE BRIEFING DEADLINES FOR PLAINTIFFS'**

4 **MOTION RE INJUNCTIVE RELIEF** was served via the District Court of Nevada's ECF system to

5 all counsel of record who have enrolled in this ECF system.

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7 By: /s/ Eric L. Cramer

8 Eric L. Cramer

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